

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

MOHAMED ALSHAMI, NADEEM  
MOHAMMAD, DERRICK TROTMAN, DAVID  
IRIZARRY, and JEFFREY PAWALL,

On behalf of themselves and all others similarly  
situated

No. 24-CV-00569-VSB

Plaintiffs,

-against-

STATE OF NEW YORK,

Defendant.

-----X

**NOTICE OF MOTION FOR A STAY**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, and all prior pleadings, papers and proceedings herein, defendant the State of New York will move this Court, before the Honorable Vernon S. Broderick, at the United States Courthouse for the Southern District of New York, located at 40 Foley Square, New York, New York, for an order pursuant to Rule 26(c) of the Federal Rules of Civil Procedure staying discovery pending the resolution of the State's motion to dismiss, and granting such other and further relief as is deemed to be just and proper.

Dated: New York, New York  
May 22, 2024


Respectfully submitted,

LETITIA JAMES  
Attorney General  
State of New York  
Attorney for Defendant

By:

/s/ EVA L. DIETZ  
Eva L. Dietz

Assistant Attorney General  
28 Liberty Street  
New York, New York 10005  
(212) 416-6211  
eva.dietz@ag.ny.gov

**APPLICATION GRANTED**  
**SO ORDERED**   
**VERNON S. BRODERICK**  
**U.S.D.J.** 6/5/2024

Having considered the relevant factors, including whether Defendant has made a “strong showing” that Plaintiffs’ claims are “unmeritorious,” “the breadth of discovery and the burden of responding to it,” and “the risk of unfair prejudice to the party opposing the stay,” *Alapaha View Ltd. v. Prodigy Network, LLC*, 20-CV-7572, 2021 WL 1893316, at \*2 (S.D.N.Y. May 10, 2021), I find that Defendant has met its burden to show good cause why discovery should be stayed. Accordingly, discovery is hereby STAYED pending my decision on the motion to dismiss. The Clerk of Court is respectfully directed to terminate the open motion at Doc. 24.